

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SHOLEM WEISNER and SHMUEL NEMANOV )  
Plaintiff and Involuntary Plaintiff )  
v. )  
GOOGLE LLC )  
Defendant )  
)

Case No.: 20-cv-02862-AKH  
("Weisner I")  
Case No.: 23-cv-08186-AKH  
("Weisner II")  
*So ordered  
7-22-25  
Albert J. Hellerstein*

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PLAINTIFF SHOLEM WEISNER'S  
AMENDED MOTION FOR LEAVE TO FILE  
DOCUMENTS UNDER SEAL

PLEASE TAKE NOTICE that Plaintiff, SHOLEM WEISNER ("Weisner"), by and through its undersigned counsel, respectfully moves, pursuant to the Court's Individual Rule 4.B, for permission to leave to file materials under seal. Specifically, Weisner seeks to file the following materials under seal: Plaintiff's Memorandum of Law in Support of Motion to Compel Discovery and for Sanctions; and Exhibits 1-C, 1-D, 1-E, 1-F, 1-H, 1-J, 1-K, 1-L, 1-M and 1-N to the Declaration of Aaron W. Davis. As required by Rule 4(B) of the Court's Individual Rules and Practices, each of these exhibits has been contemporaneously filed on ECF under seal.

Good cause exists to file the entirety or portions of each of these exhibits under seal. The remaining redactions relate to confidential facts and testimony regarding Google's purported confidential business information, including technical details about its products and purportedly sensitive financial information about Google's business units and organization. The sealed deposition transcripts similarly reflect Google employees' testimony about that purportedly sensitive and confidential information. Google contends that the disclosure of this information to

a non-party would create a substantial risk of serious harm to Google, including by providing its competitors an unfair advantage or unfairly allowing its competitors to develop competing products. The substantial risk cannot be avoided by less restrictive means than filing under seal.

Plaintiff has filed redacted versions of the Memorandum and the exhibits on the public docket.

Accordingly, Plaintiff respectfully requests that the Court grant this motion for leave to file his Memorandum of Law in Support of Motion to Compel Discovery and for Sanctions; and Exhibits 1-C, 1-D, 1-E, 1-F, 1-H, 1-J, 1-K, 1-L, 1-M and 1-N to the Declaration of Aaron W. Davis under seal and in redacted form on the public docket.

Dated: July 17, 2025

Respectfully Submitted:

/s/ Aaron W. Davis  
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*Attorneys for Plaintiff, Sholem Weisner*

CERTIFICATE OF SERVICE:

This will certify that a true and accurate copy of the foregoing was filed and served electronically on all counsel of record via the Court's CM/ECF system, on this 17th day of July, 2025.

/s/ Aaron W. Davis  
Attorney for Plaintiff, Sholem Weisner